Little, Shauna

From: Little, Shauna
Sent: Thursday, February 4, 2021 4:21 PM
To: Houlihan, Damien
Subject: Permit Requirement Summaries

This is what was listed in the 2-page fact sheet:

Each draft permit includes specific requirements for each facility, including:

- Properly operate each oil/water separator, not exceeding its numeric design flow rate.
- Meet numeric effluent limitations for total suspended solids, oil and grease, pH, petroleum hydrocarbons such as benzene, benzo(a)pyrene, and napthalene, metals such as copper and zinc, total residual chlorine, ammonia nitrogen, and fecal coliform.
- Monitor the effluent regularly for other potential pollutants such as turbidity, chemical oxygen demand, enterococcus, fuel additives and oxygenates, and per- and poly- fluoroalkyl substances (PFAS).
- Conduct annual whole effluent toxicity (WET) testing, chemical testing of Chelsea River, and biomonitoring.
- Implement and annually certify a Stormwater Pollution Prevention Plan. The plan must specify and document the site-specific Best Management Practices (BMPs) used to control activities and operations that otherwise could contribute pollutants via stormwater discharges from each facility. A list of the required BMPs, including practices relating to major storm events, are included in each draft permit.

This is what was listed in the EJA:

EPA has, in accordance with the CWA, proposed several conditions in the permits that address concerns raised by the public. Specifically:

1. In determining whether discharges from the Facilities have reasonable potential to cause or contribute to a violation of water quality standards, the draft permits do not allow a mixing zone. In other words, where numeric effluent limitations have been derived for the discharges, they apply at end-of-pipe, regardless of any dilution that mixing with river water would provide.
2. The draft permits limit the flow from each facility based on the design flow capacity of a Facility's respective treatment system.
3. The draft permits limit discharge of total suspended solids from each facility based on the design flow capacity of a facility's respective treatment system.
4. The draft permits establish new effluent limitations for indicator parameters for multiple classes of pollutants associated with petroleum products (e.g., individual polycyclic aromatic hydrocarbons) at several facilities where such limits had not previously existed, and establish more stringent limits for indicator parameters for those facilities that currently have such limits (i.e., benzene, napthalene).
5. As a result of the above limitations for indicator parameters, the draft permits impose additional effluent and ambient monitoring requirements to confirm that limitations for indicator parameters are sufficient to address other pollutants associated with petroleum products and to meet water quality standards.
6. The draft permits establish new effluent limitations for certain site-specific pollutants, including ammonia, total residual chlorine, copper, cyanide, fecal coliform, and zinc, to meet water quality standards.

7. The draft permits include additional effluent limitations or monitoring requirements for Facilities that currently store or have residual contamination from the storage of certain oxygenates (e.g., methyl-tert butyl ether (MTBE) and ethanol).
8. The draft permits continue WET testing requirements in order to continue evaluating the combined effect resulting from exposure to multiple pollutants may produce a toxic effect in aquatic organisms. New effluent limitations for toxicity have also been established for any discharge that showed toxicity during the permit term.
9. The draft permits impose new monitoring requirements in order to determine whether per- and polyfluoroalkyl substances (PFAS) are present in discharges from these facilities for use in future permit decisions.
10. The draft permits include additional technology-based effluent limitations for facilities that discharge treated groundwater to surface water.
11. The draft permits impose additional requirements for discharges of hydrostatic test water, which includes requirements for ambient surface water sampling where the Chelsea River is the facility's source water for the hydrostatic testing, and discharges of treatment chemicals and additives.
12. The draft permits prohibit the discharge of tank bottom water, solid and liquid hazardous waste, vehicle and equipment wash water, ballast water, runoff from spills or releases, emulsion chemicals, wastewater remediation effluent unless explicitly authorized, fire-fighting foam, and treatment system bypasses, in order to protect the Chelsea River from toxic pollutants in such materials. Tank bottom water, for instance, remains in close contact with petroleum products for extended periods of time, during which time some of the more soluble and denser petroleum components may reach toxic levels in the water.
13. The draft permits contain requirements for stormwater pollution prevention plans (SWPPPs) and best management practices (BMPs)that require the Facilities to implement structural improvements, enhanced pollution prevention measures, and other mitigation measures.
14. The draft permits contain site-specific BMPs, including minimizing impacts from stormwater discharges from major storm events that cause extreme flooding conditions, limiting exposure of stormwater to contaminated soil, groundwater or remediation materials on site, and eliminating discharges of impacted groundwater to the stormwater systems.
15. The draft permits include self-implementing requirements, including routine inspections, and corrective actions in the event of an exceedance of a permit limitation or condition.
16. The draft permits continue to include a reopener clause for use under certain circumstances, where EPA has the authority to modify a permit, for instance, if adverse environmental impacts from the discharges were to occur.

Regards,

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